

Exhibit P

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July 26, 2012

Carmen J. Gentile, Esq.
Assistant Corporation Counsel
1100 City Hall, 65 Niagara Square
Buffalo, New York 14202

Re: Zachary Adamson v. City of Buffalo, et al
No. 11-CV-0663A

Dear Mr. Gentile:

After reviewing pertinent United States District Court for the Western District of New York case law including Silmon v. City of Buffalo, 2012 U.S. Dist. LEXIS 60930, wherein you were lead counsel for the Defendants, we submit this letter in a good faith effort to avoid unnecessary motion practice.

As you are aware, N.Y. Civ. Rights Law §50-a is not binding on Federal Courts. However, it needs to be considered in the Federal Court's analysis in determining if internal affairs or professional misconduct/standards files, investigative reports, prior formal complaints, prior use of force reports, etc., in hard or electronic format are discoverable.

We ask that you agree to and voluntarily submit each Defendant officers' personnel file, internal affairs or professional misconduct/standards files, prior formal complaints made against each individual Defendant, investigative reports and prior use of force reports, to Magistrate Judge Hugh Scott for an in camera review.

Please provide a response to this request no later than 5:00 p.m. Friday July 27, 2012.

Thank you for your ongoing attention in regard to this matter and anticipated cooperation to avoid unnecessary motion practice.

Very truly yours,

SPADAFORA & VERRASTRO, LLP


Joseph C. Todoro

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